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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
(CAMDEN)**

In Re:	Chapter 13
Malissa Williams Debtor	Case Number: 19-31691-JNP
Jasmone R.E. Brockington	Hearing: March 17, 2020 at 10:00AM
Horace J. Odum Co-Debtors	

**NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY
AND CO-DEBTOR STAY**

TO:

Malissa Williams
246 Sickle Lane
Woodbury, NJ 08096

Brad J. Sadek, Esquire
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

Isabel C. Balboa, Esquire
Cherry Tree Corporate Center
535 Route 38 - Suite 580
Cherry Hill, NJ 08002

Jasmone R.E. Brockington
246 Sickle Lane
Woodbury, NJ 08096

Horace J. Odum
246 Sickle Lane
Woodbury, NJ 08096

U.S. Trustee
US Dept of Justice
Office of the U.S. Trustee
One Newark Center Ste 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT on March 17, 2020 at 10:00AM or as soon as counsel may be heard, the undersigned, attorneys for creditor, RoundPoint Mortgage Servicing Corporation ("Creditor"), by its attorneys, Stern and Eisenberg PC, will move before the Honorable Jerrold N. Poslusny, Jr. in Courtroom 4C, United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, NJ 08101, for an Order granting Creditor relief from the automatic stay provisions of the Bankruptcy Code; modifying, terminating and vacating the automatic

stay pursuant to 11 U.S.C. §362 (d) and the co-debtor stay pursuant to §1301 with respect to real property located at (and known as) 246 Sickle Lane, Deptford, NJ 08096 (the “Property”) in the Debtor(s)' possession and control. Creditor's Motion shall also request that the Order granting the foregoing relief allow Creditor to proceed with process or other lawful action against Debtor(s) necessary to recover possession of the Property and to otherwise exercise all rights under State and Federal Law in and to the Property, including without limitation, the right to foreclose, sell or otherwise transfer the Property. Creditor seeks to enforce its rights as more fully set forth in the mortgage and note dated 07/31/2018. Creditor will rely on the attached Certification in Support of this Motion. Creditor further seeks that in the event the instant case is dismissed or otherwise terminated (without discharge) that the Automatic Stay arising under any subsequent filing within a year of such dismissal be limited to 30 days unless extended by Court Order.

If you oppose the motion you must file a response within the time provided under the Rules of Bankruptcy Procedure and Local Rules. If you do not file a timely response then the requested relief may be entered without further hearing.

Creditor will also request that Debtor(s) will not be considered current with Creditor at the conclusion of the instant case.

Respectfully Submitted:

By: /s/ Christopher M. McMonagle, Esq.
Christopher M. McMonagle, Esq.
Stern & Eisenberg, PC
Counsel for Movant

Date: February 20, 2020